

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE:	:	BK. No. 18-12507-elf
ELLEN PENOT	:	
	:	
Debtor	:	
SPECIALIZED LOAN SERVICING, LLC	:	
AS SERVICING AGENT FOR THE BANK	:	
OF NEW YORK MELLON FKA THE BANK OF	:	
NEW YORK, AS TRUSTEE FOR THE	:	
CERTIFICATEHOLDERS OF THE CWABS	:	
INC, ASSET-BACKED CERTIFICATES	:	
SERIES 2007-1	:	
	:	
Movant,	:	
	:	
v.	:	Chapter No. 13
	:	
ELLEN PENOT	:	
RICHARD PENOT, and	:	
KENNETH E. WEST, Trustee	:	
	:	
Respondents	:	

ANSWER

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted.
7. Denied. This refers to a document which speaks for itself.
8. Denied. This refers to a document which speaks for itself.
9. Denied. The Debtor's equity has increased since the case was filed.
10. Denied.

11. Denied. Debtor is desirous of entering into a Stipulation with Movant to cure post-petition arrears.

12. Denied.

13. Denied.

WHEREFORE, Debtor requests that the Motion for Relief be denied.

Respectfully Submitted,

BELLO, REILLEY, McGRORY & DiPIPPA, P.C.

Dated: March 21, 2022

By: /s/ Daniel T. McGrory
DANIEL T. MCGRORY, ESQUIRE